

HONORABLE JAMES L. ROBART

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

SUNSET RIDGE OF BELLEVUE
OWNERS ASSOCIATION, a Washington
non-profit corporation,

Plaintiff,

vs.

HOLYOKE MUTUAL INSURANCE
COMPANY IN SALEM, an Illinois
Corporation COUNTRY MUTUAL
INSURANCE COMPANY, an Illinois
Corporation; COUNTRY CASUALTY
INSURANCE COMPANY, an Illinois
Corporation; and DOE INSURANCE
COMPANIES 1-10,

Defendants.

NO. 2:24-cv-00584-JLR

STIPULATION AND MOTION TO
STAY ACTION

NOTE ON MOTION CALENDAR:
August 8, 2024

Plaintiff Sunset Ridge of Bellevue Owners Association brings this action for declaratory judgment, bad faith, and violation of the Consumer Protection Act relating to claims under property insurance policies for alleged damage to exterior components of condominium buildings. Defendants COUNTRY Mutual Insurance Company and COUNTRY Casualty Insurance Company (collectively “Country”) have not completed evaluation and determination of coverage for plaintiff’s property damage claim. However, Plaintiff filed this suit in order to

STIPULATION AND MOTION
TO STAY ACTION – 1

061590.000002

NO.: 2:24-cv-00584-JLR

REED McCLURE

ATTORNEYS AT LAW
FINANCIAL CENTER
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SEATTLE, WASHINGTON 98161-1087
(206) 292-4900; FAX (206) 223-0152

1 comply with the terms of the Country insurance policies at issue in this case. The parties jointly
2 acknowledge it is best for Country to complete its coverage evaluation before litigation proceeds.

3 The parties therefore stipulate that this action should be stayed through September 30,
4 2024. Country's answer to the complaint should be due 14 days after the stay ends. The pending
5 deadlines in the court's Order Regarding Initial Disclosures, Joint Status Report and Early
6 Settlement should be extended. The parties stipulate that Initial Disclosures Pursuant to FRCP
7 26(a)(1) shall be served no later than 21 days after the stay ends, and the Combined Joint Status
8 Report and Discovery Plan shall be filed no later than 28 days after the stay ends.

9 DATED this 8th day of August, 2024.

10 REED McCLURE

11
12 By: /s/ Michael S. Rogers

13 Michael S. Rogers, WSBA #16423
14 Attorney for Defendants Holyoke Mut. Ins. Co.
15 in Salem, COUNTRY Mutual Insurance
16 Company and COUNTRY Casualty Insurance
17 Company
18 1215 Fourth Avenue, Suite 1700
19 Seattle, WA 98161-1087
20 mrogers@rmlaw.com

21 By /s/ Cortney Feniello

22 Justin D. Sudweeks, WSBA 28755
23 Daniel Stein, WSBA 48739
24 Jerry Stein, WSBA 27721
25 Cortney Feniello, WSBA 57352
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STIPULATION AND MOTION
TO STAY ACTION – 2

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2 IT IS SO ORDERED.
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4 DONE this 9th day of August, 2024.
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8 HONORABLE JAMES L. ROBART
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STIPULATION AND MOTION
TO STAY ACTION – 3

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